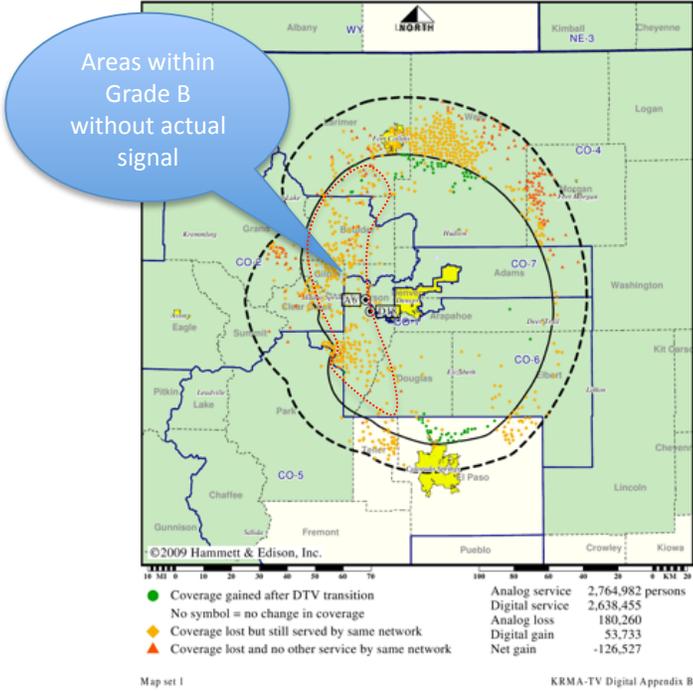


# Use of Unrealistic R-6602 Model Overly Restricts TVBDs

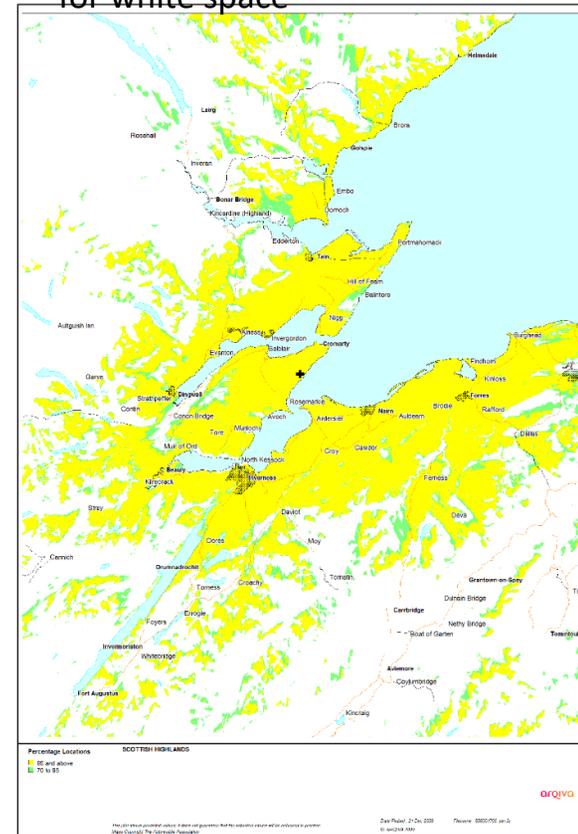
Station KRMA-TV • Analog Channel 6, DTV Channel 18 • Denver, CO  
 Expected Operation on June 13: Appendix B Facility  
 Digital Appendix B (solid): 115 kW ERP at 331 m HAAT, Network: PBS  
 vs. Analog (dashed): 100 kW ERP at 292 m HAAT, Network: PBS  
 Market: Denver, CO



Map set 1 KRMA-TV Digital Appendix B

<http://www.fcc.gov/mb/engineering/maps/images/callsigns/KRMA.gif>

Ofcom/Arqiva coverage prediction for white space



“the Commission's traditional predictive methodology for determining a Grade B contour is inappropriate for predicting signal strength at individual locations...The traditional methodology does not accurately reflect all the topographic differences in a station's transmission area, and explicitly does not account for interference from other signals. These omissions make it an imperfect methodology for predicting whether an individual household can receive an adequate signal.” R&O, Docket 98-201 (February 2, 1999) at para. 67